

1 JASON M. FRIERSON  
2 United States Attorney  
3 Nevada Bar No. 7709  
JACOB H. OPERSKALSKI  
4 Assistant United States Attorney  
Nevada Bar No. 14746  
5 Assistant United States Attorney  
501 Las Vegas Boulevard South, Suite 1100  
Las Vegas, Nevada 89101  
(702) 388-6336  
6 Jacob.Operskalski@usdoj.gov  
*Attorneys for the United States*  
7

8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**  
9

10 UNITED STATES OF AMERICA,

2:20-CR-156-RFB-DJA

11 Plaintiff,

**Second Stipulation Regarding ECF Docs.**  
**404-406**

12 v.

13 ROSALIO ANDRES SIGUENZA-  
ROMERO, aka "Tweety,"

14 Defendant,

15 ZENITH FIREARMS, INC.,

16 Petitioner.

17  
18 The United States of America and counsel for Zenith Firearms, Inc. (ZFI), Aaron  
19 D. Lovaas, Esq., agree as follows:

20 1. On June 2, 2023, Zenith Firearms, Inc. (ZFI) filed a Petition for Ancillary  
21 Hearing, ECF No. 404, Declaration of Kutlay Kaya, ECF No. 405, and Certificate of  
22 Service, ECF No. 406.

23 2. The United States has not filed a response, but is in contact with counsel for  
24 the Petitioner with the intent of negotiating a resolution without the need for the hearing.

25 3. Counsel for the Petitioner does not object to the United States filing a  
26 response at a later date, but counsel for the Petitioner and for the United States previously  
27 stipulated that the Petition shall be held in abeyance while the Petitioner and the United  
28 States negotiate in good faith. ECF No. 543.

1       4. On October 17, 2023, the Court ordered: "Counsel to file resolution or Status  
2 Report within 60 days." ECF No. 548 at 2.

3       5. At this time, the United States intends on requesting additional  
4 documentation from the Petitioner to support the claim.

5       6. This stipulation is not sought for purposes of delay. Undersigned government  
6 counsel has been attending to time-sensitive matters and intends to resolve this with  
7 Petitioner.

8       7. The parties are requesting another 90 days to resolve this matter.

9       8. If the negotiations do not result in a stipulated resolution, the United States  
10 and counsel for the Petitioner will inform the Court, and the United States will then file a  
11 response to the Petition.

12      Respectfully submitted this 15th day of December, 2023.

14      NEWMEYER & DILLION LLP

15      Aaron D. Lovaas  
16      AARON D. LOVAAS, ESQ  
17      Counsel for Zenith Firearms, Inc. on behalf of  
18      ZENITH FIREARMS, INC.  
19      Petitioner

JASON M. FRIERSON  
United States Attorney

Jacob H. Operskalski  
JACOB H. OPERSKALSKI  
Assistant United States Attorney

21      IT IS SO ORDERED:

22  
23  
24      \_\_\_\_\_  
25      RICHARD F. BOULWARE, II  
26      UNITED STATES DISTRICT JUDGE  
27  
28

DATED: \_\_\_\_\_